

This fact sheet contains:

- The background of the site
- A description and history of the site
- A summary of U.S. EPA's proposed plan to address contamination at the site and U.S. EPA's recommended alternative
- Information on how the public can participate in selecting the final cleanup remedy

### **Public Comment Period**

U.S. EPA will accept written comment on its recommended alternative during a 30-day public comment period:

July 9, 2001 through August 7, 2001

# **Public Meeting**

U.S. EPA will hold a meeting to discuss the proposed plan and to answer any questions regarding the proposed plan. Oral and written comments will be accepted at the meeting on **July 18, 2001**.

Time: 7:00 - 9:00 p.m.
Place: Howell Carnegie
District Library

314 W. Grand River Avenue

Howell, Michigan

United States Environmental Protection Agency Office of Public Affairs Region 5 77 West Jackson Boulevard Chicago, Illinois 60604-3590 Illinois, Indiana Michigan, Minnesota Ohio, Wisconsin

# **Proposed Plan Fact Sheet for the Shiawassee River Superfund Site**

Livingston County, Michigan

**July 2001** 

#### Introduction

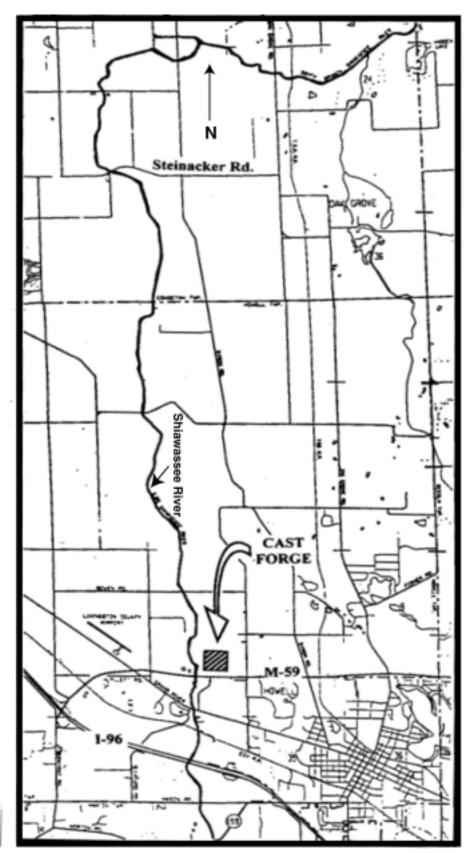
This Proposed Plan fact sheet discusses the cleanup alternatives under consideration by the United States Environmental Protection Agency (U.S. EPA) for addressing contamination associated with the South Branch of the Shiawassee River in Livingston County, Michigan. Further, it presents the combination of cleanup alternatives being recommended by U.S. EPA for cleanup of the Shiawassee River Superfund site. U.S. EPA recommends cleaning up polychlorinated biphenyls (PCBs) in flood plain soil and soil at the former Cast Forge facility, at or above 10 parts per million (ppm) and sediment at or above 5 ppm for one mile downstream of the site. The contaminated material would then be disposed of at an approved facility off site (Alternative 3).

The site is currently defined as the former Cast Forge Company (CFC) property, and the South Branch of the Shiawassee River from the plant property on M-59, downstream approximately eight miles to Steinacker Road, (see Figure 1). U.S. EPA is required to publish the Proposed Plan and make it available for public review and comment by Section 117(a) of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) of 1980, as amended by the Superfund Amendments and Reauthorization Act (SARA) of 1986.

The Proposed Plan is based on the information obtained from the Remedial Investigation/Feasibility Study (RI/FS) conducted by the Michigan Department of Environmental Quality (MDEQ), with funding from U.S. EPA, and the supplemental RI/FS (SRI/FS) conducted by U.S. EPA. The RI collected and analyzed information to determine the nature of contamination present at the site. The information from the RI was presented to the public at a meeting in July 1991. The FS identifies and evaluates the most appropriate technologies for addressing contamination problems at the site.

Public input on the proposed cleanup alternatives is an important element in the cleanup selection process. After reviewing the public comments, and any other new information, U.S. EPA may elect to move forward with the original proposed plan, modify a component of the proposed plan, or select a different cleanup alternative. Therefore, residents of the Livingston County area, and any other interested parties, are strongly encouraged to review and comment on the technologies and alternatives presented in this Proposed Plan.

Figure 1- Enlarged Site Map



### **Introduction (Continued)**

Copies of the RI/FS, SRI/FS, and other decision making documents, are available for review in the site information repository, which is located at the Howell Carnegie District Library, 314 West Grand River, at the corner of the Chestnut St., in downtown Howell. Please check with the librarian in order to access the information repository.

## **Site Description**

The Shiawassee River Superfund site includes the former CFC facility (now Hayes Lemmerz, International) located at 22440 West Highland Road (M-59), Howell, Michigan, and an approximate eight miles of the Shiawassee River downstream to the Steinacker Road area. The CFC facility covers about 51 acres and is bordered on the north and east by wetlands, on the west by the South Branch of the Shiawassee River, and on the south by Highway M-59. The South Branch of the Shiawassee River is bordered by flood plains, rural areas, and wetlands. Forested areas also border sections of the river, which is about 20 to 45 feet wide. Residences are located along the river.

# Site History

The old CFC facility manufactured aluminum wheels for the automotive industry. From 1969 through 1972 the manufacturing process at CFC involved the use of PCBs as a heat retardant in oils. Improper waste handling practices at the property from 1969 through 1976 resulted in disposal of PCB-laden wastewater and sludges on the CFC property, as well as the release of PCB-laden oils to an adjoining wetland and to the South Branch of the Shiawassee River. Areas of the CFC property that were impacted by these disposal practices included the following (also see map, Figure 2): Initial unlined lagoon; Former settling tank and discharge pipe; Former lined lagoon, overflow ditch, and overflow lagoon; Flat area behind building and; Former discharge pipe area on the river bank.

### Site Actions

In 1973, the Michigan Department of Natural Resources (MDNR now known as MDEQ) was alerted to two unauthorized oil discharges to the Shiawassee River from CFC. MDNR required CFC to change their waste handling practices. However, two additional unauthorized oil discharges to the Shiawassee River from CFC occurred in 1974 and 1979. Follow-up studies were conducted on the river sediment and fish population. Elevated levels of PCBs were detected in both sediment and fish.

In 1981, the Livingston County Health Department announced advisories on the human consumption of fish taken from the South Branch of Shiawassee River from Howell downstream to Owossa, Michigan. The warnings against the consumption of fish continue to the present for that portion of the river. The advisories are publicly noticed in state-issued fishing license material and other locations.

Also in 1981, a Consent Judgement was finalized between the State of Michigan and CFC. The Consent Judgement required CFC to undertake cleanup actions of soil and sediment PCB contamination on the plant property, in the area of the unlined lagoon, and in the wetland area at the confluence of the drainage ditch and the South Branch of the Shiawassee River. Approximately 2,300 cubic yards of PCB-contaminated sediment were removed at the CFC discharge area, the Bowen Road Bridge area, and from small pockets of oily sediment between CFC and Bowen Road. The company also was required to pay the State of Michigan \$700,000 for injuries to the natural resources, and \$50,000 as reimbursement for costs incurred by the state. While these actions removed some of the worst contamination from the site, significant PCB contamination remained on the plant property and in the river. Because of concerns about possible exposure to the PCB contamination, U.S. EPA listed the site on the National Priorities List (NPL). The NPL is a list of the nation's top priority hazardous waste sites eligible for investigation and cleanup under the Superfund program.

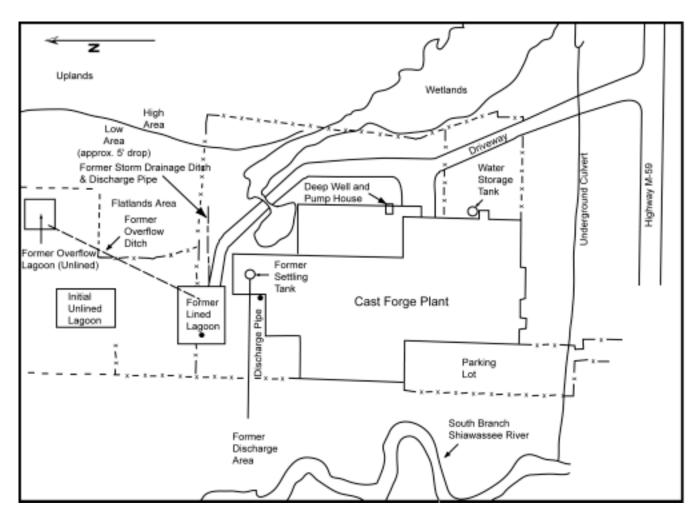


Figure 2 - Former Cast Forge Facility

### Remedial Investigation (RI)

The RI was conducted from 1986 to 1992. The investigation divided the Shiawassee River site into two areas, the CFC plant area, and the South Branch of the Shiawassee River. The focus of the RI was to:

- Assess the CFC plant site and the distribution of PCBs after the initial cleanup;
- Evaluate the effectiveness of the initial cleanup of 1.5 miles of river;
- Assess the movement of PCBs in the flood plains and river sediment downstream; and
- Evaluate the impact of PCBs on river wildlife and aquatic organisms.

The assessment and evaluation process involved collecting samples from soil, subsurface soil, and ground water around the CFC plant. It also included the collection of river water, sediment, fish, and animals living along the river. All of these were analyzed for the presence of a variety of chemicals.

The RI was completed in 1992. The findings for the plant area identified residual PCB concentrations of concern in wetlands east of the plant and in the flood plain at the point where a discharge pipe from the lagoons once existed.

The RI analysis of the river flood plain and river sediment in the area of the initial 1.5 mile removal identified PCB concentrations ranging from less than 1 ppm up to 700 ppm. As expected, the 1.5 miles of river immediately downstream of Cast Forge contained the highest residual PCB concentrations identified by the RI.

PCBs in the rest of the study area, approximately six miles of river, were detected intermittently at concentrations ranging from less than 1 ppm to a maximum of 22 ppm.

Vegetation and several species of wildlife were sampled and their tissues analyzed for the presence of PCBs. The wildlife species collected included earthworms, shrews, muskrats, raccoons, fish, crayfish, and snapping turtles. Fish, vegetation, and worms contained PCBs at detectable levels. Analysis of fish tissue samples identified the presence of PCBs in excess of federal Food and Drug Administration standards for human consumption.

### **Supplemental Investigation**

In August of 1998, MDEQ issued a Proposed Plan for the site and evaluated similar cleanup alternatives as presented in this Proposed Plan. Because the data that MDEQ used to develop its cost estimates for the 1998 Proposed Plan was obtained as long ago as 1986, U.S. EPA determined that additional data should be obtained to develop more up to date and accurate cost estimates for the site.

Additional sampling of the site began in November 1999 and was completed in April 2000. This sample data was released to the public in the Data Evaluation Report, May 2000. The Supplemental Feasibility Study Report was completed in February 2001. Both of these reports are available for review at the information repository.

During the additional sampling conducted in 1999, river sediment and flood plain soil samples were collected at previously sampled locations or transects, a distance of approximately eight miles downstream of the CFC facility, to delineate PCB "hot spots" and also to refine the estimate of the volume of sediment that will require cleanup. Sediment samples were also collected from a wetland approximately 14 miles downstream of the CFC facility, Shaw Lake, and the Shiawasseetown Reservoir to assess whether PCBs had moved from the site to these areas and whether PCBs were present at elevated levels. Surface and subsurface soil samples were collected at the CFC facility in areas of formerly identified soil contamination.

PCB contamination identified at the CFC facility was located mainly in the former wastewater ponds located on the east side of the property. PCB contamination in the flood plain soil and river sediment was limited to isolated "hot spots." The "hot spots" were located within three miles downstream of the CFC facility. A summary of the additional sampling results is given in the table on the next page.

During the additional sampling, fish shocking was conducted at select locations to determine the types of fish present in the Shiawassee River and whether the fish have any visible physical deformities that may be attributable to contamination in the river. Fish shocking involves introducing an electrical current into the water which shocks and stuns the fish causing them to rise to the surface where they can be observed. This did not harm the fish. The types of fish found included blue gill, pumpkinseed, and rock bass. No physical deformities of the fish were noted.

### Risk Assessment (RA)

As part of the original RI/FS, an analysis was made to determine the potential risks to human health and the environment that the site poses. This analysis is referred to as a Baseline Risk Assessment (RA). The Shiawassee River site RA focused on human direct contact with soil or sediment and ingestion of food or water from the river. The risk was determined by evaluating PCB concentrations as they currently exist at the CFC site, and in and along the river, prior to further cleanup.

PCBs were detected the entire eight mile length of the study area at concentrations above levels considered protective of people and wildlife consuming fish from the Shiawassee River site. The RA indicates that nearby residents have the highest potential risk from PCBs. This risk is estimated to be four additional cases of cancer for every 100 people who are exposed to the PCB contamination for a lifetime of 70 years. Wildlife considered to be at greatest risk includes fish-eating mammals and birds such as mink and kingfisher.

## Feasibility Study (FS)

The Supplemental Feasibility Study Report evaluated a series of cleanup alternatives to address the PCBs at the CFC facility, in the floodplain, and in the river. PCBs are typically attached to sediment in rivers, and since sediment moves around in rivers there is often a wide variation in PCB levels in sediment downstream of where the PCBs entered the river. In developing cleanup approaches for rivers, U.S. EPA uses a method called Surface Weighted Average Concentration (SWAC), which determines the average concentration of a con-

taminant for a particular length of river (reach). The table below has two different SWAC evaluations for the Shiawassee River. The top portion of the table is the SWAC for the particular reach listed if that reach is cleaned up to the criteria listed above it. The bottom portion of the table is the SWAC for the first five miles if the section of the reach is cleaned up to the cleanup criteria listed above it. The term "1 ppm replacement" means that after the PCB deposit is removed, the resulting concentration will be 1 ppm or less.

# Shiawassee River Projected Average PCB Concentration in Sediment

Reach		Cleanup Cr	riteria (ppm)		Average PCB
(Miles)	25	10	5	1	Concentration Based on 1999 Sampling
	Projected A	Average Sediment	PCB Concentration	on with 1 ppm Re	placement for each Mile.
0-1	2.7	2.3	1.5	0.8	3.0
1-2	0.9	0.9	0.8	0.6	1.0
2-3	n/c	n/c	n/c	0.6	0.6
3-4	n/c	n/c	n/c	0.7	0.8
4-5	n/c	n/c	1.3	0.9	1.5
Reach (Miles)	Projected Avera	age Sediment PCB	Concentration w	ith 1 ppm Replace	ement for Specified Reaches.
0-1	2.7	1.28	1.06	0.97	3.0
0-2	1.9	1.25	1.02	0.85	2.9
0-3	1.56	1.25	1.02	0.81	1.6
0-4	1.29	1.25	1.02	0.79	1.5
0-5	1.29	1.25	0.99	0.70	1.4

n/c: No cleanup necessary to meet criteria.

# **Cleanup Alternatives**

All cleanup alternatives rely to an extent on a process called natural recovery. Natural recovery means the slow decrease in PCB levels in sediments as the PCBs are mixed with cleaner sediments, break down, or are otherwise lost from the river. Over time, PCB levels will continue to decrease even with Alternative 1, no action. In evaluating the effectiveness of the various alternatives, U.S. EPA looked carefully at the SWAC levels in the various river reaches, with and without any cleanup.

Complete removal of the PCB contamination from river sediments is typically difficult or impossible and would have its own impacts on the river and floodplain. U.S. EPA developed the following alternatives with these considerations in mind.

#### **Alternative 1 - No Action**

Regulations governing the Superfund program require that the "no action" alternative be evaluated to establish a baseline for comparison. Under this alternative, no cleanup action would be taken. PCB-contaminated soil and sediment would be left in place at the CFC facility and in the Shiawassee River and flood plain. Natural recovery would act to lower PCB concentrations over time.

# Alternative 2 - Engineered Caps with Deed and River Use Restrictions

Alternative 2 involves placing caps over contaminated soil and sediment at the Shiawassee River site. A clay and soil cap would be placed over the contaminated flood plain soil area. The cap would be placed in contaminated areas to prevent movement of PCBs downriver and direct contact with contaminated soil. Based on information collected during the RI. 2,945 square meters of contaminated soil would need to be capped to meet the PCB cleanup criteria of 10 ppm, and 537 square meters of contaminated soil would need to be capped to meet the PCB cleanup criteria of 25 ppm. The cap would consist of six inches of clay fill material topped with six inches of topsoil. The capped areas would be revegetated to prevent erosion of the cap. Deed restrictions would be necessary after cap construction to maintain the integrity of the cap by prohibiting intrusive activities in the capped areas.

Alternative 2 also involves placing a cap over contaminated river sediment. A material such as AquaBlock<sup>TM</sup> would be placed over contaminated areas to prevent sediment movement downriver and direct contact with contaminated sediment. The AquaBlock<sup>TM</sup> material consists of pellets with a gravel interior surrounded by clay material. Sediment barriers such as silt fences are first placed around the area of contaminated sediment. The AquaBlock<sup>TM</sup> material is then placed in the river bed over the contaminated material. The water hydrates the clay surrounding the pellets, causing the clay to expand and form an impermeable barrier. The sediment cap would consist of six inches of the capping material. An estimated 1,539 square meters of river sediment would need to be capped to meet the PCB cleanup criteria of 10 ppm, while 690 square meters of river sediment would need to be capped to meet the PCB cleanup criteria of 25 ppm.

# Alternative 3 - Excavation and Off-Site Landfill Disposal of Contaminated Soil and Sediment

Alternative 3 involves excavating PCB-contaminated soil at the CFC facility and on the river flood plain and



contaminated sediment in the Shiawassee River. An estimated 795 cubic yards of contaminated soil would be excavated from the CFC facility to meet the PCB cleanup criteria of 10 ppm while no CFC facility soil would require removal to meet the PCB cleanup criteria of 25 ppm. In addition 1,755 cubic yards of contaminated soil would be excavated from the flood plain to meet the 10 ppm cleanup criteria, while 561 cubic yards of contaminated soil would be excavated from the flood plain to meet the 25 ppm cleanup criteria.

This alternative also consists of dredging PCB-contaminated sediment from the riverbed. An estimated 11,975 cubic yards of contaminated sediment would need to be

removed to meet the 1 ppm cleanup criteria, 1590 cubic yards would need to be removed to meet the 5 ppm cleanup criteria, 613 cubic yards would need to be removed to meet the 10 ppm cleanup criteria, and 275 cubic yards would need to be removed to meet the 25 ppm cleanup criteria.

Under Alternative 3, excavated soil and sediment containing PCB concentrations exceeding 50 ppm would be disposed of at an off-site Toxic Substances Control Act (TSCA)-approved landfill facility and soil containing PCB concentrations less than 50 ppm would be disposed of at an off-site sanitary landfill facility.

# Alternative 4 - Excavation and On-Site Disposal of Contaminated Soil and Sediment

Alternative 4 is similar to Alternative 3; however, excavated soil and sediment would be placed in an on-site TSCA-approved disposal cell constructed on the CFC property.

Under this alternative, contaminated soil and sediment would be excavated and transported to the CFC property and placed in the TSCA cell. Ground-water monitoring would be conducted as required under TSCA regulations to ensure that PCBs are not released to ground water at the site.

# **Explanation of the Nine Criteria**

U.S. EPA uses nine criteria to evaluate the cleanup alternatives. A table comparing the remedial alternatives against these criteria is provided on the next page. The recommended alternative (Alternative 3) is the alternative that complies with Criteria 1 and 2, achieves the best balance among Criteria 3 through 7, and considers Criteria 8 and 9.

# 1. Overall Protection of Human Health and the Environment.

Assessment of the degree to which the cleanup alternative eliminates, reduces, or controls threats to public health and the environment.



- 2. Compliance with Applicable or Relevant and Appropriate Requirements (ARARs). An evaluation of whether or not the alternative complies with all other state and federal regulations environmental or otherwise.
- 3. Long-Term Effectiveness and Permanence. The cleanup alternative is evaluated in terms of its ability to maintain reliable protection of human health and the environment over time once the cleanup goals have been met.



4. Reduction of Toxicity, Mobility, or Volume Through Treatment. An evaluation of how well a cleanup alternative reduces the harmful nature of the chemicals; the ability of the chemicals to move from the site into the surrounding area; and the amount of contaminated material.

**5. Short-Term Effectiveness.** The length of time needed to implement a cleanup alternative is considered. U.S. EPA also assesses the risks that carrying out the cleanup alternative may pose to workers and nearby residents.



- **6. Implementability.** An assessment of how difficult the cleanup alternative will be to construct and operate, and whether the technology is readily available.
- **7. Cost.** A comparison of the costs of each alternative. Includes capital, operation, and maintenance costs.



- **8. State Acceptance.** U.S. EPA takes into account whether or not the state agrees with the recommended alternative, and considers comments from the state on the RI/FS Reports and Proposed Plan.
- 9. Community Acceptance.

U.S. EPA considers the comments of local residents on the recommended alternative presented in this Proposed Plan and RI/FS Reports.



Evaluation Criteria	Alternative 1 No Action	Alternative 2 Capping	Alternative 3 Excavation and Off-Site Disposal	Alternative 4 Excavation and On-Site Disposal	
Overall Protection of Human Health and the Environment					
2. Compliance with ARARs					
3. Long-Term Effectiveness and Permanence					
4. Reduction of Toxicity, Mobility, or Volume Through Treatment					
5. Short-Term Effectiveness					
6. Implementability					
7. Total Cost – 1 ppm 5 ppm 10 ppm 25 ppm	\$6,000 \$6,000 \$6,000 \$6,000	\$215,600 \$157,500	\$1,677,000 \$517,000* \$408,300 \$115,000	\$842,000 \$594,000 \$591,000 \$272,000	
8. State Acceptance	To be determined				
9. Community Acceptance	Community acceptance will be evaluated after the public comment period.				

<sup>\*</sup> Cost for the preferred alternative at 5 ppm.

For both Alternatives 3 and 4, when the sediment cleanup level is 5 and 1 ppm, the floodplain cleanup level is 10.

Different methods were used to calculate volumes for 25 and 10 ppm than for 5 and 1 ppm. Because the volumes are so low with the sediment cleanup, the difference in cost is not considered to be significant.

# **Use This Space to Write Your Comments**

Your input on the recommended cleanup alternative for the Shiawassee River Superfund site is important to U.S. EPA. Comments provided by the public are valuable in helping U.S. EPA select a final cleanup plan for the site.

You may use the space below to write your comments then fold and mail to the address on the reverse side. You may fax your comments to Tom Williams, U.S. EPA Remedial Project Manager at (312) 886-4071. Comments may also be sent via email to: williams.thomas@epa.gov. Faxed or emailed comments must be received on or before the close of business August 7, 2001. Mailed comments must be postmarked on or before August 7, 2001.

If you have any questions about the comment at 1-800-621-8431 ext. 67478.	period, contact Dave Novak at (312) 886-7478, or toll-free
	Name
	Address
	CityState

# **Shiawassee River Superfund Site Public Comment Sheet**

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Tom Williams Remedial Project Manager Office of Superfund (SR-6J) U.S. EPA Region 5 77 West Jackson Boulevard Chicago, IL 60604-3590

# Evaluation of the Alternatives and the Recommended Alternative

U.S. EPA has evaluated each alternative according to the nine evaluation criteria and recommends Alternative 3, Excavation and Off-Site Landfill Disposal of Contaminated Soil to 10 ppm and sediment in the first mile of the river to 5 ppm.

U.S. EPA believes that Alternative 3 provides the best protection of human health and the environment with regard to the nine criteria. A comparison of the cleanup alternatives against the nine criteria can be found in the chart on page 8 of this fact sheet.

U.S. EPA does not recommend Alternative 1, no action, because it does not protect human health or the environment. Alternative 2, capping of the soil and sediment, is not sufficiently protective and has lower long-term effectiveness than Alternatives 3 and 4. Alternatives 3 and 4 differ only in whether the PCB-contaminated materials are disposed of off-site (Alternative 3) or on-site (Alternative 4). U.S. EPA believes that the ease of implementability for the off-site disposal of the relatively small volumes of materials anticipated makes Alternative 3 preferable.

U.S. EPA has identified a SWAC range of .003 to 0.2 ppm as being protective of human health and wildlife. In evaluating the range of potential cleanup criteria for Alternative 3, U.S. EPA believes that the SWAC calculations indicate that the most cost-effective sediment cleanup includes removal of sediments above 5 ppm in the first river mile. This reduces the overall SWAC for the first 5 miles of the river from 3.0 to 1.06. The reductions in SWAC from applying the 5 ppm cleanup criteria to the first five miles, which would lower the SWAC from 1.06 to 0.99 ppm, or from applying a 1 ppm cleanup criteria to the river, which could lower the SWAC to a range of 0.7 to 0.97, would significantly raise cleanup cost while only marginally lowering the SWAC. As such, U.S. EPA is relying on natural recovery to reduce the SWAC further after removal of sediments above 5 ppm in the first river mile.

In addition, cleanup in the additional river miles would require greater disturbance of the river and floodplain such as the need for access for construction equipment. This alternative also requires cleanup of contaminated soil at the CFC facility and in the floodplain to 10 ppm, which is protective of human health and the environment.

# **Community Participation**

U.S. EPA will accept written comments on this Proposed Plan during a public comment period from **July 9 through August 7, 2001**. U.S. EPA will evaluate public comments received during the public comment period before selecting a final cleanup remedy. Comments provided by residents and other interested individuals are valuable in helping U.S. EPA select a final cleanup for the site.

At the conclusion of the comment period, U.S. EPA will review all of the comments it receives before making a final decision. U.S. EPA will respond to the comments in a document called a Responsiveness Summary. The Responsiveness Summary will be placed in the Information Repository. U.S. EPA encourages you to share your views about this Proposed Plan.

U.S. EPA provides you with two ways to express your opinions during the public comment period:

- 1. You may send your comments to Tom Williams, Remedial Project Manager for the site. Comments can be sent directly to Tom via mail, email, or fax. We have included a comment sheet in this fact sheet for your convenience.
- 2. You may also submit oral and written comments during the public meeting at the Howell Carnegie District Library. A court reporter will be present to record your oral comments.

# **Information Repository**

U.S. EPA has established a file for public review called an information repository. The Information Repository contains documents related



to the Shiawassee River Superfund site and the Superfund Program. The repository is located at:

Howell Carnegie District Library 314 W. Grand River Ave. Howell, Michigan

An Administrative Record, which contains all of the information upon which the selection of a cleanup plan is based, will also be available at the Howell Carnegie District Library.

### **Contact Information**

If you would like more information about the Shiawassee site, please contact:

**Dave Novak** 

Community Involvement Coordinator Office of Public Affairs (P-19J) U.S. EPA Region 5

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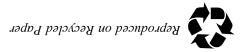
### Web Site

This Proposed Plan can be found on the following web site:

#### www.epa.gov/region5/sites

Scroll through the list to find the Shiawassee River Superfund site.





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